

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ARDUINO, LLC,

Plaintiff,

-v-

ARDUINO S.R.L. f/k/a SMART PROJECTS
S.R.L.; GHEO SA; CC LOGISTICS, LLC;
MAGYC NOW LTD; DOG HUNTER INC.; DOG
HUNTER LLC; DOG HUNTER AG; TULYP
HOLDING SA; GIANLUCA MARTINO;
FEDERICO MUSTO; and DOES 1-10,

Defendants.

Civil Action No.: 1:15-cv-10181-DJC

MOTION TO EXTEND STAY OF DISCOVERY DEADLINES

Plaintiff Arduino, LLC respectfully submits this Motion to Extend Stay of Discovery Deadlines. Plaintiff seeks a further stay of all discovery deadlines through July 8, 2016.

Plaintiff's understanding is that the Judge in the co-pending Italian litigation strongly suggested, and the Parties agreed, to suspend all pending actions against each other, but that Defendants' counsel has not yet received instruction from his clients regarding this motion.

The Parties first sought a joint stay of all deadlines on April 26, 2016 based on their "substantial progress in reaching an agreement to resolve this matter." Dkt. 60. Your Honor granted this request with the Order of April 27, 2016. Dkt. 61. As reported in the Parties Joint Status Report of May 27, 2016, negotiations are continuing but the agreement has not yet been finalized. Dkt. 63. Plaintiff now seeks an extension of the stay through July 8, 2016 in order to allow the Parties to continue negotiating a worldwide settlement agreement without the

distraction and additional burden of litigation. Plaintiff will notify the Court regarding the status of settlement at that time.

Respectfully submitted,

Dated: June 2, 2016

/s/ Martin B. Schwimmer
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Lori L Cooper
Lori L. Cooper